1	Therese M. Shanks, Esq. (SBN 12890)		
2	Wade Beavers, Esq. (SBN 13451) Kendall M. Lovell, Esq. (SBN 15590)		
3	MaryJo E. Smart, Esq. (SBN 16139)		
4	FENNEMORE CRAIG, P.C. 7800 Rancharrah Parkway		
5	Reno, Nevada 89511 Tel: 775-788-2228 Fax: 775-788-2229		
	tshanks@fennemorelaw.com; wbeavers@fennen		
6	klovell@fennemorelaw.com; msmart@fennemorelaw.com	relaw.com	
7	Andrew K. Stutzman, Esq. (PA Bar No. 72922) Stradley Ronon Stevens & Young, LLP		
8	2005 Market Street, Ste. 2600		
9	Philadelphia, PA 19103-7018 Tel: 215-564-8728 Fax: 215-564-8210		
10	AStuztman@stradley.com		
11	Pro Hac Vice		
12	Attorneys for Plaintiff		
13	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
14	INNOVATIV MEDIA GROUP, INC., a	CASE NO.: 2:22-cv-01362-CDS-VCF	
15	Wyoming corporation,	STIPULATION AND [PROPOSED] ORDER	
16	Plaintiffs,	FOR EXTENSION OF TIME TO ANSWER	
17	VS.	VERIFIED AMENDED COMPLAINT [ECF 52]	
18	MICHAEL BEYS; RICHARD DE SILVA; and FTE NETWORKS, INC., a Nevada		
19	corporation	(First Request)	
20	Defendants.		
21	STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER		
22	VERIFIED AMENDED COMPLAINT		
	Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiff		
23	Innovativ Media Group, Inc. ("Plaintiff") and Defendants Michael Beys, Richard de Silva and FTE		
24	Networks, Inc. ("Defendants"), stipulate through their undersigned counsel that Defendants'		
25	deadline to file a response to Plaintiffs' Verified Amended Complaint [ECF 52] be extended to		
26	December 30, 2022. Plaintiff consents to the extension.		
27	/////		
28			

	II	
1	It is further agreed that nothing in this stipulation shall be deemed to waive or prejudice	
2	any claims or defenses of any party to this action.	
3	DATED this 23 rd day of December, 2022.	
4	FENNEMORE CRAIG, P.C.	LEX DOMUS LAW
5	By: <u>/s/ Therese M. Shanks</u> Therese M. Shanks, Esq. (SBN 12890)	By: <u>/s/ Brandi M. Planet</u> Daniel S. Cereghino, Esq. (SBN 11534)
6 7	Wade Beavers, Esq. (SBN 13451) Kendall M. Lovell, Esq. (SBN 15590) MaryJo E. Smart, Esq. (SBN 16139)	Brandi M. Planet, Esq. (SBN 11710) Austin M. Maul, Esq. (SBN 15596)
8	7800 Rancharrah Parkway Reno, Nevada 89511	1712 Tesara Vista Place Las Vegas, Nevada 89128
9	-AND-	Attorneys for Defendants
11	Andrew K. Stutzman, Esq. (PA Bar No. 72922) Stradley Ronon Stevens & Young, LLP	
12	2005 Market Street, Ste. 2600 Philadelphia, PA 19103-7018	
13 14	Tel: 215-564-8728 Fax: 215-564-8210 <u>AStuztman@stradley.com</u> Pro Hac Vice	
15	Attorneys for Plaintiff	
16 17	DATED this 30th day of December, 2022.	وفعي
18		IT IS SO CALEPED
19		An Contract
20		UNITED STATES MAGISTRATE JUDGE
21		
22		
23		
24		
25		
2627		
28		
20		